



U.S. Department of Justice

United States Attorney  
Southern District of New York

86 Chambers Street  
New York, New York 10007

June 29, 2023

**By ECF**

The Honorable J. Paul Oetken  
U.S. District Judge  
Thurgood Marshall U.S. Courthouse  
40 Foley Square  
New York, NY 10007

Re: *New York Times Co. v. Department of State*, 22 Civ. 791 (JPO)

Dear Judge Oetken:

We write respectfully on behalf of all parties to provide a status report in the above-captioned action brought under the Freedom of Information Act (“FOIA”).

Since the parties’ last status report, the Department of State has continued to make monthly productions of records responsive to the FOIA request. Although the State Department had expected to complete its productions by the end of April, the consultations and remaining processing took longer than expected. At this time, only four documents remain to be produced, and the State Department expects to complete processing of those documents by the end of July. Thereafter, the parties will meet and confer to determine what if any issues remain to be resolved in the litigation.

The parties had previously proposed to inform the Court in this status report as to whether summary judgment motion practice will be necessary, and the Court endorsed that proposal. ECF No. 22. The parties respectfully request to defer that question until the next status report, after the productions have been completed and the parties have had an opportunity to meet and confer to determine whether it is possible to resolve any outstanding issues without motion practice.

The parties respectfully propose to file the next status report on or before August 30, 2023.

We thank the Court for its consideration of this submission.

Respectfully submitted,

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